



Comments on the Proposal for a new Aquaculture Zone in the North of Malta GF00250/07 21st April 2017

BirdLife Malta has revised the Proposal for a new Aquaculture Zone in the North of Malta, as a reaction on this public consultation we would like to stress the below comments:

Based on the information provided in the PDS, we are of the opinion that before the development of another Aquaculture Zone in Malta is approved and realised, further scientific assessments are required to fully understand the impacts on the marine and terrestrial environment caused by fish farms in Malta, particularly to identify environmentally sustainable fish farming practices within the Marine Special Protection Area Il-Bahar ta' madwar Ghawdex.

In this document we would like to highlight that there is a paucity of data regarding the marine environment, missing regulatory standards and law enforcement for aquaculture in Malta including waste management, environmental health and security standards and opportunities for a sustainable design of aquaculture in Malta.

With respect to the proposed development, we would like to comment that:

- **The proposed development requires to undertake an Appropriate Assessment (AA) and full Environmental Impact Assessment (EIA) by law** due to its location within the boundaries of a marine Natura 2000 site and EIA Regulations 2007, section 6.3.1.1. (ii).
- The lack of scientific data on Malta's marine environment - including the lack of management plans for Marine Protected Areas - is a major problem for developing an aquaculture zone within a Marine Protected Area. Negative impacts on the marine environment, including seabirds which are rafting and feeding in this area, cannot be evaluated appropriately at this point in time and **suitable monitoring measures have to be set up prior to the designation of an aquaculture zone within an MPA**. Aquaculture can provide services to coastal ecosystems such as carbon sequestration, nutrient or phytoplankton biomitigation and benthic biodiversity restoration. However, these benefits only apply if fish farms in aquaculture zones are properly managed and if fish farmers respect regulatory frameworks – something which is missing across the sector in the Maltese Islands. These regulatory frameworks should aim towards a sustainable integration of economic purposes and marine conservation within the aquaculture zone. IUCN (2017) states, that if the MPA came first, then a Habitats Regulation Appraisal (HRA) is required. It should provide, and analyse sufficient information to allow a competent authority to ascertain whether the plan or project will not adversely affect the site's integrity.¹ The lack of appropriate Marine Spatial Plans for Malta's territorial waters adds on to this challenge. Hence, regulatory frameworks applying for fish farm operators are in urgent need to guarantee sustainable practises and avoid stakeholder conflict. **An EIA for this development should**

¹ IUCN (2017): Aquaculture and Marine Protected Areas.
<https://portals.iucn.org/library/sites/library/files/documents/Rep-2017-003.pdf>

therefore ensure it takes full consideration of marine spatial planning exercises, management plans preparations and other ongoing initiatives being taken by various authorities in their drive for a sustainable management of our territorial waters.

- Regular monitoring measures undertaken by governmental authorities are furthermore necessary to avoid any sort of leakage from the fish farms, such as oily scum, food remains, and escapees. Especially the waste circle has to be closed, all generated waste products have to be disposed on land and recycled. We fully support that “Service vessel crew and farm personnel should also be made aware of the consequences of such rubbish ending up in the sea” (page 19). **Current monitoring measures of fish farms in Malta are insufficient**, which can be witnessed by fish farms being located in too close distance to each other and also located too close to the shore line (e.g. fish farms located in St. Paul’s Bay). It is highly recommended to make it obligatory by law to install skimmers on all fish farms to collect oily scum. However, additional techniques which could be more suitable for Malta should be researched. Rigorous monitoring can only be possible if the responsible authorities equip themselves to monitor the marine environment for such a scale of development, and therefore **the EIA should identify the monitoring requirements which should be tackled, if it is to be ensured that this aquaculture installation is not detrimental to water quality, ecology and other sensitive receptors** expected to be affected.
- The reasons to justify the creation of a second aquaculture zone in the north of Malta stated in the PDS are questionable since these could lead to pressure of relocating existing fish farms without sufficiently considering negative impacts caused by these farms beforehand. On page 4 of the PDS it says, “The development of an additional AZ is therefore required to satisfy the Government’s policy for aquaculture development and growth and is actually in demand amongst existing operators and would be required for the operator to satisfy the PA’s orders and relocate to a permitted AZ further offshore”. All necessary environmental impact studies have to be carried out before creating the proposed aquaculture zone and based on these results, decisions should be taken.
- Environmental health and security standards have to be developed based on the results of the before-mentioned studies of the marine environment and with respect to security assessments for workers.
- Aquaculture in MPAs has the potential to create synergies. It is highly important to bear in mind conservation efforts, restocking and lowering environmental footprints as well as reducing stakeholder conflict. The intensity of production systems including size and volume of farms and bred species should always be adjusted in case a change of the surrounding ecosystems appears. These have to be regarded in the EIA and AA as well as in the monitoring measures. **Such possible scenarios should be modelled and catered for, such as these guide the permit conditions**, should the EIA and AA conclude that the development may go through.